

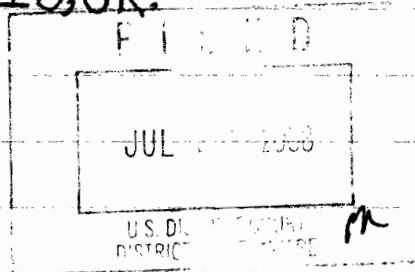
IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

WILLIAM FRANCIS, JR.

Plaintiff,

v.

C.A. No.: 07-015-JJF



WARDEN THOMAS CARROLL,
CORRECTIONAL MEDICAL SERVICES TRIAL BY JURY
STAN TAYLOR, and JOYCE TALLEY, OF TWELVE
Defendants. DEMANDED

PLAINTIFF'S MOTION FOR STAY OF
PROCEEDINGS, APPOINTMENT OF COUNSEL
AND NOTICE OF ADDRESS CHANGE

COMES NOW, Plaintiff, William Francis, Jr. (herein-
after "Plaintiff"), prose, and moves this Honorable
Court to stay the proceedings and appoint counsel
and in support thereof states as follows:

1. Plaintiff is currently residing at the Plummer
Community Correction Center (PCCC) at 38 Todds
Lane/Wilmington, DE 19802-3210/Telephone: (302)
577-2848/Facsimile: (302) 577-2403. He is unemployed
and currently seeking full- or part- time employment.

2. Plaintiff is prohibited from visiting any libraries, law libraries; he doesn't have access to the internet, copy and fax machines; and the Plummer Center does not have a law library or offer paralegal services to work release residents.

3. Plaintiff's anticipated release date, good time credits pending, is October 2008.

4. Plaintiff's terms of federal and state probation are subject to transfer to his home state of New York pursuant to the Interstate Compact agreement.

5. Based on the responses to Plaintiff's First Set of Interrogatories filed by defendant Correctional Medical Services Inc., it is apparent that there exists genuine issues of material fact indispute between the parties which require extensive research, production of additional medical records and expert testimony.

6. Plaintiff does not have enough experience in civil practice and procedure in order to represent himself any further.

7. No prejudice will result to defendants as there is no scheduling order in place and the matter is not set for trial.

WHEREFORE, Plaintiff William Francis, Jr. respectfully requests a stay of proceedings until Plaintiff has transitioned from work release to New York State and the Court appoints counsel.

/s/ William Francis, Jr.
William Francis, Jr., plaintiff, pro se
SBI: 264560
Plummer Community Correction Center
38 Todds Lane
Wilmington, DE 19802-3210

Dated: July 13, 2008

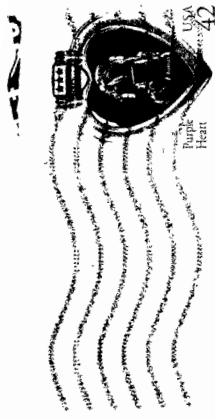
CERTIFICATE OF SERVICE

Plaintiff, William Francis, Jr., hereby certifies that on July 19, 2008, he served via mail copies of the foregoing MOTION to counsels of record:

Ophelia M. Waters,	Eileen M. Ford, Esquire
820 North French Street, 6th Fl.	913 North Market Street, #800
Wilmington, DE 19801	Wilmington, DE 19801

William Francis, Jr.
SBI: 264560
38 Todds Lane
Wilmington, DE 19802

WILMINGTON DE 197
21 JUL 2008 PM 1 P



Office of the Clerk
U.S. District Court
844 N. King Street, Lockbox 18-
Wilmington, DELAWARE 19801 - 3570

19801-3570

